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May 30, 2023

Via Electronic Filing

Honorable Matthew J. Skahill, U.S.M.J.
Mitchell H. Cohen U.S. Courthouse
1 John F. Gerry Plaza-4th & Cooper Sts.
Camden, New Jersey 08101

Re: Eric Hines v. Gary Lanigan, et al,
Civil Action No.: 17-cv-02864 (NLH-MJS)

Dear Judge Skahill:

I represent the State Defendants in the above-entitled matter. I write to apologize to the Court for missing the scheduled conference call on May 26, 2023, at 2:30 P.M. In response to Defendants' May 5, 2023, letter that provided a status update, the Court adjourned the May 19, 2023, conference until May 26, 2026. However, I failed to properly document the new date on my calendar and missed the conference. I accept full responsibility for this oversight.

As an update on the status of the case, Defendants conducted Plaintiff's deposition on May 4, 2023, and Plaintiff conducted the depositions of Defendants Waters, Jackson, Smith, Marin and McNair on May 10 through 11, 2023. Defendants do not intend to secure the services of any expert witnesses.

A matter that Defendants had intended to bring to the Court's attention during the conference relates to the Fourth Amended Complaint. Plaintiff agreed to file an amended complaint to exclude several defendants who were not served. However, Plaintiff's counsel, Mr. Solomon Radner, Esq., acknowledged that he mistakenly listed two unserved defendants, SCO Perry and SID Petit, as Defendants. When the



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mistake was brought to his attention, the parties agreed to file a stipulation of dismissal for those two defendants.

Please note that Defendants acknowledge the date dispositive motions are due and will proceed accordingly. I thank the Court for its attention to this matter.

Respectfully submitted,

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By: s/Marvin L. Freeman
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